

ORIGINAL

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

MAILING ONLINE SERVICE

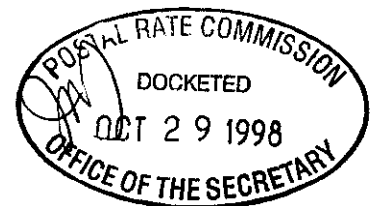
Docket No. MC98-1

**FOURTH INTERROGATORIES OF
MAIL ADVERTISING SERVICE ASSOCIATION INTERNATIONAL
TO USPS WITNESS GARVEY
(USPS-T1-19 - 22)**

In accordance with Order No. 1216 of the Postal Rate Commission, the witness is requested to provide written responses to the following interrogatories within 10 days of the date hereof. For purposes of these interrogatories, "MOL" refers to the Mailing Online Service that is the subject of these proceedings.

MASA/USPS-T1-19. Referring to you answer to MASA/USPS-T1-9:

- a. Explain in detail how "traditional lettershop activities could be impacted" by improvement in the economies of digital printing.
- b. Is it your opinion that lettershops would be positively impacted by "evolving a capacity to bid on MOL contracts? Explain your answer fully.
- c. Confirm that at most, only 25 lettershops could be awarded MOL contracts.
- d. Explain how those lettershops that bid on but were not awarded MOL contracts were positively impacted by "evolving a capacity to bid on MOL contracts."
- e. Explain in detail every way you can think of in which lettershops would be positively impacted by MOL, including in your answer your



assessment of the likelihood that such positive impact would occur and with respect to what percentage of the mailing services industry.

- f. Identify all support for your opinion that “some – perhaps many – MOL customers may outgrow MOL and become lettershop customers.” Identify any studies, data, research or other source that supports your opinion. If you intend to develop further support for the opinion, please describe in detail how you plan to do so.

MASA/USPS-T1-20.

- a. How many bidders were there for the contract awarded to successful bidder reflected in LR-11? If there were any other bidders, identify them and provide a price chart comparing each other bid by price to the one accepted.
- b. Have any request for bids been solicited with respect to other print contracts? Describe the status of the USPS effort to solicit other bidders on printing contracts.

MASA/USPS-T1-21. In response to OCA/USPS-T1-12, you state that the costs of informing potential MOL customers and advertising during the market test have been included in cost estimates. Identify where in the testimony these costs have been accounted for.

MASA/USPS-T1-22. In your testimony at page 10, lines 2-5, you state that MOL customers “will be notified of addresses that cannot be matched with existing Postal Service’s Address Management System database and are therefore being purged from the list.” In response to DFC/USPS-T5-2 (redirected from witness Plunkett), you indicate that early in the market test, the MOL system “will be modified to use the FastForward system to check addresses for address change status.”

- a. Confirm that addresses for which a change is identified by the FastForward system will not be purged.
- b. Confirm that mail for which an address change is identified by the FastForward system will be forwarded to the addressee at the correct address.
- c. Confirm that the mailer will not be provided with the address for any changed address identified by the FastForward system. Will a MOL user be notified of the names of those addressees whose mail has been forwarded as a result of the FastForward system?

- d. Confirm that the mailer will not be charged for the FastForward system. Describe the circumstances in which Fastforward is available to mailers who are not using MOL, and state whether any charge is levied in connection with use of the FastForward system.
- e. Explain whether, after FastForward is implemented for MOL, the statement in your testimony referred to in the interrogatory will still be true. If it is, explain the circumstances in which it will be true and estimate as best you are able the percentage of incorrectly addressed MOL mail that will still be purged when FastForward is in use.

Respectfully submitted,

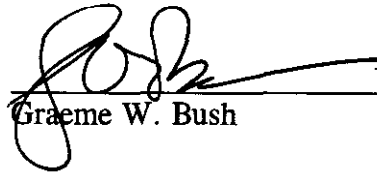


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Association International

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing interrogatories were served in accordance with Rule 12 of the Rules of Practice and POR No. MC98-1/4 this 29h day of October 1998.



Graeme W. Bush